



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

January 24, 2025

BY EMAIL

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Mout’z Soudani*, 24 Cr. 555 (CS)

Dear Judge Seibel:

The Government respectfully submits this letter to provide the Court and defense counsel with an update regarding the Government’s Rule 16 discovery productions, and request that the Court schedule a status conference for 45 to 60 days from today.

I. Discovery Updates

To date, the Government has produced to the defendant nearly 900 GB of discovery, which includes, among other things, copies of the defendant’s four devices that were seized pursuant to search warrants (marked for identification as 1B25, 1B26, 1B31, 1B34), as well as responsive sets for each of the defendant’s four electronic devices. The Government has also produced responsive sets for the following devices belonging to the defendant’s co-conspirator (the “Co-Conspirator”) that were also seized pursuant to search warrants: (1) a laptop (1B27); (2) an iPhone (1B3); and (3) an iCloud account (1B35).

Additionally, there are electronic devices obtained pursuant to search warrants that the Government (1) has determined do not contain any responsive materials, or (2) does not intend to review or seize materials from, all of which belong either to the Co-Conspirator or a Co-Conspirator’s family member. First, the Government has determined there are no responsive materials on (1) an iPhone (1B2) and (2) three iPads (1B11, 1B13, 1B14). Second, the Government does not intend to review or seize materials from four laptops belonging to the Co-Conspirator that the Government understands were used by the Co-Conspirator prior to the offense conduct and while the Co-Conspirator was working as an attorney in private practice (1B6, 1B8, 1B61, 1B62). Third, the Government does not intend to review or seize materials from a cellphone (1B9), a laptop (1B11), and another laptop (1B12) that all appear to be associated with a family member of the Co-Conspirator.

Finally, the Government anticipates it will produce a responsive set of materials seized from another cellphone belonging to the Co-Conspirator (1B1) today or early next week. The

Government's filter team has also reviewed for privilege the contents of two additional laptops belonging to the Co-Conspirator (1B5, 1B7), but the review for responsive materials by the Government's prosecution team is ongoing. The Government anticipates completing that review and producing the responsive sets to the defendant within one week.

II. Speedy Trial Exclusion of Time

In light of the Court granting the parties' request for an adjournment of yesterday's status conference, the parties respectfully request that the Court schedule a status conference for 45 to 60 days from today. The Government further requests, with no objection from defense counsel, that time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between today and the date of the next conference. The ends of justice served by the exclusion of time outweigh the best interests of the public and the defendant in a speedy trial because, among other things, the exclusion of time will allow the Government to finalize its Rule 16 productions, the defendant to continue to review discovery, and the parties to potentially resolve this case without need for a trial.

Respectfully submitted,

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by: /s/
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